

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DANIEL CAMERON M.D.,

Plaintiff,

-against-

JANN BELLAMY M.D., DAVID H. GORSKI M.D.,
STEVEN NOVELLA M.D., KIMBALL C. ATWOOD IV
M.D., HARRIET HALL M.D., MARK A. CRISLIP M.D.,

Defendants.
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Case No.: 7:18-cv-
10395(VB)

**DECLARATION OF
JANN BELLAMY IN
SUPPORT OF THE
MOTION TO DISMISS**

JANN BELLAMY, an attorney duly licensed to practice in the State of Florida, declares under the penalty of perjury as follows:

1. This Declaration is submitted in support of the accompanying motion pursuant to Fed. R. Civ. P. 12(b)(2) and (6) seeking dismissal of the Amended Complaint for an award of attorney's fees and costs, and for such other and further relief as this Court deems just and proper.

2. Attached hereto as **Exhibit "A"** is a true and correct copy of the article entitled "'Chronic Lyme' VIP Daniel Cameron disciplined by New York medical authorities" published on June 22, 2017.

3. Attached hereto as **Exhibit "B"** is a true and correct copy of the New York Department of Health, State Board for Professional Medical Conduct Statement of Charge dated April 27, 2017, and the New York Department of Health, State Board for Professional Medical Conduct's Consent Agreement and Order dated June 15, 2017.

4. Attached hereto as **Exhibit "C"** is a true and correct copy of the article entitled "Another 'Chronic Lyme' VIP disciplined by NY Medical authorities: Bernard Raxlen" published on November 9, 2017.

5 Attached hereto as **Exhibit "D"** is a true and correct copy of the article entitled
"More Political Science: Proposed laws protect "Lyme literate" doctors from discipline" published
on March 15, 2018.

6 I currently reside in Florida and at all times relevant hereto, I resided in Florida.

7 I am currently licensed to practice law in Florida only, and at all times relevant
hereto, I was only licensed to practice law in Florida.

8. Currently and at all times relevant hereto, I did not have a principal place of
business, as I was retired.

9 At all times relevant hereto, I was a volunteer contributor on the website
sciencebasedmedicine.org (hereinafter "subject website")

10 I am the sole author of the articles attached hereto as Exhibits "A", "C", and "D"

11. Defendants DAVID H. GORSKI M.D., STEVEN NOVELLA M.D., KIMBALL
C. ATWOOD IV M.D., HARRIET HALL M.D., and MARK A. CRISLIP M.D. did not participate
in or contribute to the research for, preparation, or publication of the articles attached hereto as
Exhibits "A", "C", and "D" in any manner

12 I conducted research for the articles attached hereto as Exhibits "A", "B", and "D"
in Florida

13 I prepared the articles attached hereto as Exhibits "A", "B", and "D" in Florida

14. I published the articles attached hereto as Exhibits "A", "B", and "D" by way of
the internet on the subject website in Florida.

Dated: March 11, 2019


Janin Bellamy, Esq.